

1 PATRICK D. ROBBINS (CABN 152288)
2 Acting United States Attorney

3 MARTHA BOERSCH (CABN 126569)
4 Chief, Criminal Division

5 BENJAMIN K. KLEINMAN (NYBN 5358189)
6 Assistant United States Attorney

7 1301 Clay Street, Suite 340S
8 Oakland, California 94612
9 Telephone: (510) 637-3680
10 FAX: (510) 637-3724
11 Benjamin.kleinman2@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) CASE NO. 4:25-cr-00082-AMO
17 Plaintiff,)
18 v.) UNITED STATES' APPLICATION AND
19 ANTOINE TSAO, aka Chung Tien Tsao,) [PROPOSED] ORDER TO UNSEAL INDICTMENT
20 IAN SOFRONOV, and) AND ARREST WARRANT
21 NEMANJA POPOV)
22 Defendants.)
23

24 The United States, through undersigned counsel, respectfully moves this Court to unseal the
25 Indictment and arrest warrant in the above-captioned matter. The one of the defendants, Antoine Tsao,
26 has been arrested in the Eastern District of New York, and therefore, it is no longer necessary for the
27 Indictment and arrest warrant to be sealed.

28 DATED: March 31, 2025

Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

/s/ Benjamin K. Kleinman
BENJAMIN K. KLEINMAN
Assistant United States Attorney

[PROPOSED] ORDER

On the motion of the United States, and good cause appearing therefor, the Court HEREBY ORDERS that the Indictment and arrest warrant in the above-captioned matter be unsealed.

IT IS SO ORDERED.

DATED:

HONORABLE ROBERT M. ILLMAN
United States Magistrate Judge